

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CARLOS PINEDA and ALEXANDRA PEREZ,	)	
Plaintiffs,	)	C.A. No. 05-10216-JLT
	)	
v.	)	
	)	
DANIEL KEELER, DENNIS HARRIS, JOSEPH R.)	)	
WATTS, JOSEPH P. TOOMEY, WILLIAM J.	)	
GALLAGHER, EDWARD GATELY, JANINE	)	
BUSBY, and the CITY OF BOSTON,	)	
Defendants.	)	
	)	

**MOTION TO CONTINUE**

Now comes the parties and move to continue the trial date from June 4, 2007 until the latter two weeks of July. As grounds therefore state the following:

- 1.) Discovery has bagged down due to plaintiff's counsel's three weeks of teaching law students in Russia and the recent change in counsel by defendant.
- 2.) There are still several depositions to take.
- 3.) The defendant expects to file a motion for summary judgment.
- 4.) Thus, there will be sufficient time to complete the discovery, file, and respond to the motion for summary judgment before the trial date.

Respectfully Submitted,  
Plaintiff, Carlos Pineda,  
By his attorney,

//s// Stephen Hrones  
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